

# STANDARD INSPECTION REPORT OF A GAS TRANSMISSION PIPELINE RECORD AUDIT

Unless otherwise noted, all code references are to 49CFR Part 192.  
If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

<b>Operator:</b> DYNEGY KENDALL ENERGY, LLC	Operator ID#: 32210
<b>Inspection Date(s):</b> 9/24/2014 (Half)	Man Days: 0.5
<b>Inspection Unit:</b> Dynegy Kendall Energy	
<b>Location of Audit:</b> Minooka	
<b>Exit Meeting Contact:</b> Todd Benninghoff	
<b>Inspection Type:</b> Standard Inspection - Record Audit	
<b>Pipeline Safety Representative(s):</b> Matt Smith	
<b>Company Representative to Receive Report:</b> Todd Benninghoff	
<b>Company Representative's Email Address:</b> todd.benninghoff@dynegy.com	

<b>Headquarters Address Information:</b>	601 Travis Street, Suite 1400 Houston, TX 77002 Emergency Phone#: (815) 521-1000 Fax#:	
<b>Official or Mayor's Name:</b>	Mike McConnell Phone#: (815) 521-1000 Ext: 50 Email: jbm93@dynegy.com	
<b>Inspection Contact(s)</b>	<b>Title</b>	<b>Phone No.</b>
Paul Lair	Relief Operator	(815) 521-1000Ext: 52
Tod Benninghoff	Operations Manager	

Gas System Operations		Status
Gas Transporter		NGPL and ANR
Miles of Main		2
Confirm Operator's Potential Impact Radius Calculations		439.1
Annual Report (Form 7100.2.1) reviewed for the year:		Satisfactory
Regulatory Reporting Records		Status
[191.5]	Were Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	Not Applicable
<b><u>General Comment:</u></b> Dynegy Kendall Energy has not encountered an incident.		

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[191.15(a)]	Was a DOT Incident Report Form F7100.2 submitted within 30 days after detection of an incident?	Not Applicable
<b><u>General Comment:</u></b> Dynegy Kendall Energy has not encountered an incident.		
[191.15(b)]	Were there any supplemental incident reports when deemed necessary?	Not Applicable
<b><u>General Comment:</u></b> Dynegy Kendall Energy has not encountered an incident.		
[191.23(a)]	Did the operator report Safety Related Conditions?	Not Applicable
<b><u>General Comment:</u></b> Dynegy Kendall Energy has not encountered a safety related condition.		
[191.25]	Did the Operator file a Safety Related Condition Report within 5 working days of determination, but not later than 10 working days after discovery?	Not Applicable
<b><u>General Comment:</u></b> Dynegy Kendall Energy has not encountered a safety related condition.		
[192.16(c)]	Customer Notification: Has the operator notified each customer after the customer first receives gas at a particular location?	Not Applicable
<b><u>General Comment:</u></b> This segment of pipeline is transmission and is used solely for the operator's facility. There are not any customers along the pipeline.		
<b>DRUG TESTING</b>		<b>Status</b>
Refer to Drug and Alcohol Inspection Forms and Protocols		Not Checked
<b><u>General Comment:</u></b> Staff did not inspect drug testing procedures or records during this audit.		
<b>TEST REQUIREMENTS</b>		<b>Status</b>
[192.517(a)][192.505,192.507,192.509,192.511(c)]	Are pressure test records being maintained for piping operating above 100 psig?	Not Applicable
<b><u>General Comment:</u></b> Pressure testing was not conducted on this segment of pipeline in 2011-2013.		
[192.517(b)][192.511,192.509,192.513]	Are pressure test records being maintained for at least 5 years on piping operating below 100 psig?	Not Applicable
<b><u>General Comment:</u></b> This segment of pipeline operates at pressures exceeding 100 psig. The system does not include segments that operate below 100 psig.		

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UPRATING		Status
<b><u>Category Comment:</u></b> <i>Dynegy Kendall Energy has not uprated any segment of their pipeline.</i>		
[192.555][192.555]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of 30% or more SMYS?	<b>Not Applicable</b>
[192.557][192.557]	Has the operator maintained documentation of uprating activities when uprating a pipe to a pressure that will produce a hoop stress of less than 30% SMYS?	<b>Not Applicable</b>
OPERATIONS		Status
[192.603(b)][192.605(a)]	Has the operator conducted a review of the Operations and Maintenance Manual once per yr/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed the Annual Review record located in the O&amp;M.</i>		
Has the operator conducted a review of the Operator Qualification Plan once per yr/15 months?		<b>No</b>
[192.603(b)][192.605(b)(3)]	Are construction records, maps, and operating history available to operating personnel?	<b>Satisfactory</b>
[192.603(b)][192.605(b)(8)]	Has the operator periodically reviewed personnel's work to determine the effectiveness of normal O&M procedures when deficiencies are found?	<b>Satisfactory</b>
[192.603(b)][192.605(c)(1)(i)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of unintended closure of valves or shutdowns?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An unintended closure of a valve did not occur during 2011-2013.</i>		
[192.603(b)][192.605(c)(1)(ii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside normal operating limits?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An increase or decrease in flow rate outside normal operating limits did not occur in 2011-2013.</i>		
[192.603(b)][192.605(c)(1)(iii)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of loss of communications?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>A loss of communication did not occur during 2011-2013.</i>		
[192.603(b)][192.605(c)(1)(iv)]	Does the operator maintain documentation for	<b>Not Applicable</b>

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	responding to, investigating, and correcting the cause of operation of any safety device?	
<b><u>General Comment:</u></b> <i>An operation of a safety device did not occur during 2011-2013.</i>		
[192.603(b)][192.605(c)(1)(v)]	Does the operator maintain documentation for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operation, or personnel error which may result in a hazard to persons or property?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>A malfunction of a component or deviation from normal operation did not occur in 2011-2013.</i>		
[192.603(b)][192.605(c)(2)]	Does the operator maintain documentation of checking variations from normal operation after abnormal operation has ended at sufficient critical locations in the system to determine continued integrity and safe operation?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An abnormal operation did not occur in 2011-2013.</i>		
[192.603(b)][192.605(c)(3)]	Does the operator maintain documentation of notifying responsible operator personnel when notice of an abnormal operation is received?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An abnormal operation did not occur in 2011-2013.</i>		
[192.603(b)][192.605(c)(4)]	Does the operator maintain documentation for periodically reviewing the response of operator personnel to determine the effectiveness of the procedures controlling abnormal operation and taking corrective action where deficiencies are found?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An abnormal operation did not occur in 2011-2013.</i>		
[192.603(b)][192.619,192.621,192.623]	Is the operator maintaining documentation verifying their Maximum Allowable Operating Pressure(s)? (MAOP)	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed hydrostatic pressure testing records for the pipeline when initially installed.</i>		
<b>CONTINUING SURVEILLANCE RECORDS</b>		<b>Status</b>
[192.709(c)][192.613(a)]	Has the operator reviewed continuing surveillance records for class location changes, failures, leak history, corrosion, changes in cathodic protection, and other	<b>Satisfactory</b>

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	unusual operating and maintenance conditions?	
<b>General Comment:</b> <i>Staff reviewed various records that constitute continuing surveillance records.</i>		
<b>CLASS LOCATION CHANGE</b>		<b>Status</b>
[192.709(c)][192.609]	Does the operator maintain documentation when the class location changes for a segment of pipe operating at a hoop stress that is more than 40% SMYS?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Staff reviewed class location survey records. The class location has been consistent with the pipeline located in a Class 1 location.</i>		
<b>QUALIFICATION OF PIPELINE PERSONNEL</b>		<b>Status</b>
Refer to operator Qualification Inspection Forms and Protocols		<b>Not Checked</b>
<b>General Comment:</b> <i>OQ Plan and records were not inspected as part of this audit.</i>		
<b>DAMAGE PREVENTION RECORDS</b>		<b>Status</b>
[192.709(c)][191.17(a)]	Did the operator track the number of damages per 1000 locate requests for the previous years?	<b>Satisfactory</b>
Has the number of damages increased or decreased from prior year?		<b>Same</b>
[192.709(c)][192.617]	Does the operator track records of accidents due to excavation damage to ensure causes of failures are addressed to minimize the recurrence?	<b>Not Applicable</b>
<b>General Comment:</b> <i>The pipeline segment did not encounter a failure during 2011-2013.</i>		
[192.709(c)][192.614(c)(3)]	Does the operator provide documentation pertaining to notification of excavation, marking, positive response, and the availability and use of the one call system?	<b>Unsatisfactory</b>
<b>Issue Comment:</b> <i>Although Dynegy Kendall receives an extremely low number of locate requests for the natural gas pipeline system, records were not fully provided for 2012 and 2013 for confirmation that locates were completed as required.</i>		
Does the operator have a Quality Assurance Program in place for monitoring the locating and marking of facilities?		<b>No</b>
<b>General Comment:</b> <i>A contractor is not utilized to locate along the pipeline route.</i>		
Do pipeline operators include performance measures in facility locating contracts?		<b>No</b>
<b>General Comment:</b> <i>A contractor is not utilized to locate along the pipeline route.</i>		

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[IL ADM. CO.265.100(b)(1)]	Was third party damage to mains involving a release of gas reported to ICC JULIE Enforcement? <a href="http://www.icc.illinois.gov/julie/">http://www.icc.illinois.gov/julie/</a>	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>During 2011-2013, the pipeline segment did not encounter damage due to a 3rd party.</i>		
Has the Operator adopted applicable section of the Common Ground Alliance Best Practices?		Yes
If no, were Common Ground Alliance Best Practices discussed with Operator?		Yes
<b>EMERGENCY PLANS</b>		<b>Status</b>
[192.603(b)][192.615(b)(1)]	Are supervisors, responsible for emergency action, furnished copies of the latest edition of the Emergency Plan?	<b>Satisfactory</b>
[192.603(b)][192.615(b)(2)]	Has the operator maintained documentation that the appropriate operating personnel have received training to assure they are knowledgeable of emergency procedures and that the training was effective?	<b>Unsatisfactory</b>
<b><u>NOPV Comment:</u></b> <i>Documentation was not provided that Dynegy Kendall Energy employees who are responsible for responding to an emergency were trained in 2011 to assure they are knowledgeable of the emergency procedures.</i>		
[192.603(b)][192.615(b)(3)]	Has the operator maintained documentation of employee activity reviews to determine whether the procedures were effectively followed in each emergency?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An emergency did not occur during 2011-2013 thus a review was not warranted.</i>		
[192.603(b)][192.615(c)]	Has the operator maintained documentation that the operator established and maintained liaison with appropriate fire, police and other public officials?	<b>Unsatisfactory</b>
<b><u>NOPV Comment:</u></b> <i>Documentation was not provided that liaison was established and maintained in 2011 with appropriate fire, police, and other public officials.</i>		
[192.603(b)][192.615(a)(3)]	Did the review of emergency response time intervals regarding odor/leak complaint documentation indicate adequate emergency response intervals were achieved?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>A report of a gas leak did not occur during 2011-2013.</i>		
[192.603(b)][192.615(a)(11)]	Has the operator maintained documentation of actions that were required to be taken by a controller during and emergency?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>An emergency did not occur during 2011-2013.</i>		

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PUBLIC AWARENESS PROGRAM - RECORDS		Status
<b><u>Category Comment:</u></b> <i>Public Awareness Plan and records were not inspected during this audit.</i>		
Refer to Public Awareness Program Inspection Forms and Protocols		Not Checked
ODORIZATION OF GAS		Status
<b><u>Category Comment:</u></b> <i>This segment of pipeline is not odorized.</i>		
[192.709(c)][192.625(f)]	Where required, has the operator maintained documentation of odorant concentration level testing?	Not Applicable
[192.709(c)][192.625(e)]	Where required, has the operator maintained documentation of odorizer tank levels?	Not Applicable
PATROLLING & LEAKAGE SURVEY		Status
<b><u>Category Comment:</u></b> <i>Staff reviewed leak survey/patrolling records.</i>		
[192.709(c)][192.705]	Does the operator maintain documentation of a patrol program as required?	Satisfactory
[192.709(c)][192.706]	Does the operator maintain documentation of leakage survey(s) performed on a transmission pipeline?	Satisfactory
ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES		Status
<b><u>Category Comment:</u></b> <i>This segment of pipeline is not located near a navigable waterway and no portion of the pipeline was abandoned or deactivated between 2011-2013.</i>		
[192.603(b)][192.727(b)]	Did the operator maintain documentation demonstrating that each pipeline abandoned in place was disconnected from all sources and supplies of gas, and purged of gas?	Not Applicable
[192.603(b)][192.727(c)]	Did the operator maintain documentation demonstrating that each inactive pipeline that is not being maintained under this part was disconnected from all sources and supplies of gas; purged of gas?	Not Applicable
[192.603(b)][192.727(e)]	Did the operator maintain documentation when air was used for purging that a combustible mixture was not present after purging?	Not Applicable
[192.727(g)][192.727(g)]	Did the operator maintain documentation for each abandoned onshore pipeline facility that crosses over, under or through a commercially navigable waterway?	Not Applicable

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COMPRESSOR STATION		Status
<b><u>Category Comment:</u></b> <i>This segment of pipeline does not contain a compressor station.</i>		
[192.709(c)][192.731(a)]	Has the operator maintained documentation of the compressor station relief devices at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
[192.709(c)][192.731(c)]	Has the operator maintained documentation compressor station emergency shutdown at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
[192.709(c)][192.736(c)]	Has the operator maintained documentation of the compressor stations – detection and alarms?	<b>Not Applicable</b>
<b>PRESSURE LIMITING AND REGULATION</b>		<b>Status</b>
[192.709(c)][192.739(a)]	Is the operator inspecting and testing the pressure limiting and regulating stations at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
[192.709(c)][192.743(a)]	Is the operator inspecting pressure limiting and regulating stations for adequate capacity at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Relief devices are not used at the regulator station. An operator-monitor type of configuration is used.</i>		
[192.709(c)][192.743(b)]	If the operator used calculations to determine sufficient capacity, were the calculation reviews documented at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Relief devices are not used at the regulator station. An operator-monitor type of configuration is used.</i>		
[192.709(c)][192.743(a), 192.743(b), 192.195(b)(2)]	Is overpressure protection provided by the supplier pipeline downstream of the take point?	<b>No</b>
[192.709(c)][192.743(a)]	If Yes, does the operator have documentation to verify that these devices have adequate capacity?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Dynegy Kendall Energy provides regulation at the take point.</i>		
<b>VALVE MAINTENANCE</b>		<b>Status</b>
[192.709(c)][192.745(a), 192.745(b)]	Did the operator inspect and partially operate transmission valves that might be required during any emergency at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed valve inspection records.</i>		



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[192.709(c)][192.749]	Did the operator inspect and maintain vaults > 200 cubic feet at a minimum of 1 per year/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The pipeline segment does not contain vaults.</i>		
[192.709(c)][192.179]	Are transmission line valves being installed as required of 192.179?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The entire pipeline segment is less than 2 miles long and valves are located at the take point.</i>		
[192.709(b)][192.745(b)]	Did the operator take prompt remedial action to correct any valve found inoperable, unless an alternative valve was designated?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The inspections did not indicate any issues were discovered where a valve was found to be inoperable.</i>		
<b>Investigation Of Failures</b>		<b>Status</b>
[192.709(c)][192.617]	Did the operator experience accidents or failures requiring analysis?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>This segment of pipeline did not encounter a failure.</i>		
<b>WELDING OF STEEL PIPE</b>		<b>Status</b>
[192.603(b)][192.225(b)]	Does the operator have documentation for their qualified welding procedure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The welding procedure was located in the as-built documents Section 6.</i>		
[192.603(b)][192.227, 192.229]	Does the operator have documentation of welder qualification documentation as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Welding activities did not take place on the pipeline during 2011-2013.</i>		
[192.807]	Does the operator have documentation of welder OQ records?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Welding activities did not take place on the pipeline during 2011-2013.</i>		
[192.709][192.243(b)(2)]	Does the operator have documentation of NDT personnel qualification as required?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		

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<i>Welding activities did not take place on the pipeline during 2011-2013.</i>		
[192.709][192.243(f)]	Does the operator have documentation of NDT testing performed?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>Welding activities did not take place on the pipeline during 2011-2013.</i>		
<b>CORROSION CONTROL RECORDS</b>		<b>Status</b>
[192.491(a)][192.491(a)]	Has the operator maintained maps or records of cathodically protected piping, cathodic protection facilities, galvanic anodes, and neighboring structures bonded to the cathodic protection system	<b>Satisfactory</b>
[192.491][192.459]	Has the operator maintained documentation of examination when buried pipe was exposed?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The pipeline was not excavated during 2011-2013 thus an inspection was not warranted.</i>		
[192.491][192.465(a)]	Has the operator maintained documentation of annual pipe-to-soil monitoring performed at a minimum of 1 per yr/15 months and/or isolated services or short sections of main less than 100 feet at a minimum of 10% annually?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed cathodic protection level readings.</i>		
[192.491][192.465(b)]	Has the operator maintained documentation of rectifier or other impressed current power sources inspections at a minimum of 6 per year/ 2 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>This segment of pipeline does not contain a rectifier.</i>		
[192.491][192.465(c)]	Has the operator maintained documentation of each critical interference bond, reverse current switch, diode, etc. inspections at a minimum of 6 per year/ 2 1/2 months and/or non-critical interference bond inspections at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Staff reviewed cathodic protection level records, which included bonds.</i>		
[192.491][192.465(d)]	Has the operator taken prompt remedial actions to correct any deficiencies indicated by the monitoring?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The cathodic protection level records provided to Staff did not indicate a deficiency.</i>		
[192.491][192.465(e)]	Has the operator maintained documentation of	<b>Not Applicable</b>

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	unprotected pipeline surveys, inspections, or tests at a minimum of 3 years/39 months?	
<b><u>General Comment:</u></b> <i>The segment of pipeline does not contain unprotected pipelines.</i>		
[192.491][192.467(a),192.467(c),192.467(d)]	Has the operator maintained documentation of inspections or tests for electrical isolation including casings?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The segment of pipeline does not include casings.</i>		
[192.491][192.469]	Does the operator have a sufficient number of test stations or other contact points for electrical measurement to determine the adequacy of cathodic protection?	<b>Satisfactory</b>
[192.491][192.471]	Has the operator maintained documentation of corrective actions taken when a test lead is no longer electrically conductive?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>During 2011-2013 corrective action was not required on any test lead location.</i>		
[192.491][192.473(b)]	Has the operator maintained documentation of inspections or tests to assure their cathodic protection system is not affecting adjacent underground metallic structures?	<b>Satisfactory</b>
[192.491][192.475(a)]	Has the operator maintained documentation of investigations or steps taken to minimize internal corrosion due to transportation of corrosive gas?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not transport corrosive gas.</i>		
[192.491][192.475(b)]	Has the operator maintained documentation of internal surface inspections performed when pipe is removed for any reason?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>During 2011-2013 segments of the pipeline were not removed for any reason.</i>		
[192.491]	Has the operator maintained documentation of written procedures supported by as-built drawings or other construction records?	<b>Satisfactory</b>
[192.491][192.477]	Has the operator maintained documentation of internal corrosion coupon monitoring at a minimum of 2 per year/ 7 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		

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<i>The operator does not transport corrosive gas.</i>		
[192.491][192.479]	Has the operator maintained documentation of corrective action where atmospheric corrosion was discovered?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The records provided to Staff did not indicate any deficiencies found during the atmospheric corrosion inspections.</i>		
[192.491][192.481]	Has the operator maintained documentation of atmospheric corrosion control monitoring at a minimum of 1 per 3 years/ 39 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Atmospheric corrosion inspections were included with the patrolling records. These inspection are completed twice a year.</i>		
[192.491][192.483(a),192.483(b),192.483(c)]	Has the operator maintained documentation demonstrating that pipe removed due to external corrosion has been repaired or replaced with pipe that was coated and cathodically protected?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>No segments of the pipeline were replaced during the 2011-2013 time frame.</i>		
TRAINING - 83 IL ADM. CODE 520		Status
[520.10(a) (1)]	Has the operator maintained documentation demonstrating that personnel have received adequate training?	<b>Satisfactory</b>
[520.10(a) (2)]	Do training records include verbal instruction and/or on the job training for each job classification?	<b>Satisfactory</b>
[520.10(b)]	Has the municipal operator maintained documentation demonstrating that personnel have received adequate training?	<b>Satisfactory</b>
[520.10(a)(5)]	Are procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	<b>Satisfactory</b>

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